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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL THEIR  
OPPOSITION TO WAYMO'S  
SUPPLEMENTAL BRIEF IN  
SUPPORT OF WAYMO'S MOTION  
IN LIMINE NO. 4**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal their Opposition to Waymo’s Supplemental Brief in Support of Waymo’s Motion *In Limine* No. 4. Specifically, Defendants request an order granting leave to file under seal the following confidential documents:

| Document   | Portions to Be Filed Under Seal | Designating Party   |
|--|---------------------------------|---|
| Opposition to Waymo’s Supplemental Brief in Support of Waymo’s Motion <i>In Limine</i> No. 4 | Highlighted Portions            | Plaintiff (Green)   |
| Exhibit 1  | Highlighted Portions            | Plaintiff (Green)   |
| Exhibit 4  | Entire Document                 | Defendants (Blue-Highlighted Portions)<br>Plaintiff (Entire Document) |
| Exhibit 6  | Entire Document                 | Plaintiff   |

The blue-highlighted portions of Exhibit 4 contain highly confidential information regarding the technical details of Uber’s LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber’s LiDAR sensors, such that Uber’s competitive standing could be significantly harmed. (Declaration of Thomas Pardini in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Pardini Decl.”) ¶ 3.)

The green-highlighted portions of the Opposition and Exhibit 1, as well as the entireties of Exhibits 4 and 6, contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Pardini Decl. ¶ 4.)

1 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
2 documents at issue, with accompanying chamber copies.

3 Defendants served Waymo with this Administrative Motion to File Documents Under  
4 Seal on October 25, 2017.

5 For the foregoing reasons, Defendants request that the Court enter the accompanying  
6 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
7 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
8 ATTORNEYS' EYES ONLY."

9 Dated: October 25, 2017

MORRISON & FOERSTER LLP

10  
11 By: /s/ Arturo J. Gonzalez  
ARTURO J. GONZALEZ

12 Attorneys for Defendants  
13 UBER TECHNOLOGIES, INC. and  
14 OTTOMOTTO LLC  
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